

Exhibit 174



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"I will stand for my client's rights.
I am a trial lawyer."
-Ron Motley (1944-2013)

January 30, 2019

VIA ELECTRONIC MAIL

Paul Boehm, Esq.
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RE: *In Re National Prescription Opioid Litigation*; Case No. 17-md-2804
The County of Summit, Ohio, et al. v. Purdue Pharma L.P., et al., Case No. 18-op-45090
**City of Cleveland, Cuyahoga County, Summit County/City of
Akron Public Official Depositions.**

Counsel,

In response to your letter of January 24, 2019 in regards to depositions for certain public officials: City of Cleveland, Cuyahoga County, Summit County and City of Akron, will all agree that they will not seek to call any of them as trial witnesses. We will also state that we do not anticipate offering sworn testimony or affidavits in opposition to Defendants' Motions for Summary Judgment. However, because we have not yet seen your filings for summary judgement, we cannot agree that we will not offer testimony of affidavits at this time. Instead, we can agree that if we see the need to file such a sworn statement we agree to provide Defendants the opportunity to depose the witness. As a result of this agreement, there is no need for any of these apex witnesses to be deposed.

Please note, Judge Oldfield was not on the list. Judge Oldfield was also considered a public/elected official for purposes of these depositions.

Please don't hesitate to contact me if you wish to discuss this matter further.

Kind regards,

/s/ Anne McGinness Kearse

Anne McGinness Kearse

cc: All Plaintiffs' Counsel (mdl2804discovery@motleyrice.com)
All Defense Counsel (xALLDEFENDANTS-MDL2804-Service@arnoldporter.com)